

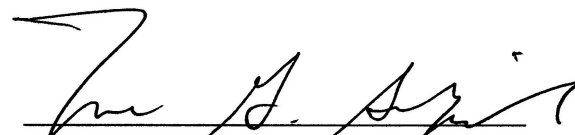
November 17, 2021

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Application GRANTED. Plaintiff's unredacted version of the Motion for Preliminary Injunction at Dkt. No. 97 shall remain under seal with access restricted to parties identified in the Appendix to this letter for the reasons identified in the letter at Dkt. No. 103.

Dated: December 9, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: **Wenger S.A. v. Galaxy Brands LLC, et al.**
Case No.: 1:20-cv-01107-LGS
Letter Motion To Seal

Dear Judge Schofield:

On November 17, 2021 defendant Olivet International, Inc (“Olivet”) and co-defendant Galaxy International, Inc (“Galaxy”) were not in agreement with waiving confidential privileges pertaining to Exhibits attached to Plaintiff Wenger S.A.’s Motion For A Lifting Of The Stay And For A Preliminary Injunction As To Olivet International, Inc. and the Exhibits attached to the Declaration of Maxim H. Waldbaum and the Declaration of John Pulichino In Support Of Wenger S.A.’S Motion For A Preliminary Injunction As To Olivet International, Inc., And For A Lifting Of The Stay In This Litigation.

Pursuant to Your Honor’s Individual Rules and Procedures For Civil Cases and the Court’s standing order, 19-mc-00583, and ECF Rules & Instructions, section 6, Plaintiff files this Letter Motion to Seal the proposed sealed documents filed in connection with Plaintiff Wenger S.A.’s Motion For A Lifting Of The Stay And For A Preliminary Injunction As To Olivet International, Inc. and the Exhibits attached to the Declaration of Maxim H. Waldbaum and the Declaration of John Pulichino In Support Of Wenger S.A.’S Motion For A Preliminary Injunction As To Olivet International, Inc., And For A Lifting Of The Stay In This Litigation.

Thank you for your assistance in reviewing this request.

Respectfully submitted,

RIMON, P.C.

By: /s/ Maxim H. Waldbaum

Maxim H. Waldbaum

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*Attorney(s) for Attorney for
Plaintiff-Counter Defendant
Wenger S.A.*

cc: All parties via Notice of Electronic Filing by ECF

**APPENDIX IDENTIFYING ALL PARTIES AND ATTORNEYS OF RECORD WHO
SHOULD HAVE ACCESS TO THE SEALED DOCUMENTS TO MOTION FOR A
LIFTING OF THE STAY AND FOR A PRELIMINARY INJUNCTION AS TO
OLIVET INTERNATIONAL, INC.**

Plaintiff

Wenger S.A.

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Counter Claimant

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Counter Defendant

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Counter Claimant

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Charles D. Pfister
(See above for address)

Counter Defendant

Wenger S.A.

represented by **Maxim Howard Waldbaum**
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